

Solomon M. Radner, Esq. (NJ SBN 283502018)

Keith Altman, Esq. (*pro hac vice*)

Stanley H. Kremen (*pro hac vice*)

THE LAW OFFICE OF KEITH ALTMAN

33228 West 12 Mile Road, Suite 375

Farmington Hills, MI 48334

Telephone: (248) 987-8929

keithaltman@kaltmanlaw.com

solomonradner@kaltmanlaw.com

stanleykremen@kaltmanlaw.com

shk@shk-dplc.com

Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

TRUTEK CORP.,

Plaintiff,

v.

Yeong Wan Cho (a.k.a. Peter Cho); Abdul
Gaffar; Sei Young Yun; Salvacion USA,
Inc.; Salvacion International, LLC; Salvacion
Co., Ltd.; Salvacion R&D Center; Biosure
Global, Ltd.; Inmobiliaria La Salvacion,
R.D.; John and Jane Does 1 through 10
(gender neutral fictitious names); ABC
Corporation 1 through 10 (fictitious names),

Defendants.

Civil Action No.: 2:23-cv-3709

**PLAINTIFF'S SECOND
MOTION FOR EXTENSION
OF TIME TO SERVE
DEFENDANTS**

Document Electronically Filed

Plaintiff, TRUTEK CORP., by and through its attorneys, hereby respectfully
moves the Court for a further extension of the current deadline for service of process

of the Summons and Complaint applicable under Rule 4 of the Federal Rules of Civil Procedure. In support thereof, Plaintiff states the following:

1. Plaintiff filed their Complaint on July 11, 2023. (ECF 1).
2. At this time, Plaintiff has not yet served all Defendants with the Complaint and Summons as required.
3. Lead counsel for Plaintiff seeks additional time to serve process on certain Defendants.
4. Defendants are located in Korea and require translation of all documents relevant to proper service.
5. The original deadline to serve Defendants with the Complaint and Summons was October 9, 2023.
6. Plaintiff was granted an extension of 120 days (to and including February 6, 2023) in order to fully translate documents and exhibits in preparation of international service of process and to serve the international Defendants. (ECF 45).
7. Plaintiff has made extensive good faith efforts to communicate with other counsel in order to timely and cost effectively serve the many Defendants in this case.

8. Due to the international process required, Plaintiff's are limited in their ability to perfect service. All documentation is with the Korean officials to serve the Defendant. However, service has not yet been made.

9. On February 4, 2024, Defendants counsel offered to coordinate service on the Korean Defendants.

10. Plaintiff respectfully requests a further 60-day extension to perfect service to and including April 6, 2024.

11. Counsel for Plaintiff has sought concurrence of this Motion from counsel for the Defendants who have Appearances on file.

12. Defendants counsel have expressed they would agree to a seven day extension. However, Plaintiff feel that timeframe inadequate to accomplish service due to the international service required and coordination of such.

13. This request is not filed for the purpose of delay; no party will be prejudiced by the granting of this motion.

Plaintiff respectfully requests that the Court approve the foregoing Motion for Extension of Time to Serve Defendants.

Date: February 6, 2024

Respectfully Submitted,

/s/ Solomon Radner

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CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2024, I served the foregoing document upon all parties by filing this document on this court's CM/ECF electronic filing system which will send a true copy to all counsel of record.

/s/ Solomon M. Radner

Attorney for Plaintiffs